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January 24, 2024

VIA ECF

Hon. Paul A. Engelmayer
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1305
New York, New York 10007

Re: *Carlyle Aviation Management Limited, et al. v. Frontier Airlines, Inc.*, No. 1:23-cv-04774 (PAE) (S.D.N.Y.)

Dear Judge Engelmayer:

We are the attorneys for Plaintiffs in the above-captioned action. Pursuant to Your Honor's Individual Practices Rule 3.I., Plaintiffs write to respectfully request an extension of time to respond to Frontier Airlines, Inc.'s ("Frontier" or "Defendant") Counterclaim, filed on September 6, 2023 (Dkt. No. 30).

Pursuant to the Court's Order, dated January 16, 2024 (Dkt. No. 72), the Court denied Plaintiffs' Motion to Dismiss Frontier's Counterclaim and Frontier's Cross-Motion to Consolidate this action with *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Ltd. et al.*, No. 22 Civ. 2943 (PAE) (S.D.N.Y.). Accordingly, and pursuant to Rule 12(a)(4)(A) of the Federal Rules of Civil Procedure, Plaintiffs' deadline to respond to Frontier's Counterclaim is January 30, 2024. Plaintiffs' respectfully request an extension of time to respond to Frontier's Counterclaim to February 15, 2024. This is Plaintiffs' first request for an extension of time to respond to Frontier's Counterclaim. Counsel for Frontier consents to this request.

Respectfully submitted,

/s/ Jed M. Schwartz

Jed M. Schwartz

cc: All Counsel of record (via ECF)

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